

COVID-19 Preparedness and Response Plan

Phase 1, 2, 3

In accordance with Executive Order 2020-142, The Romine Group, Inc. (“TRG” or “TRG”) institutes this COVID-19 Preparedness and Response Plan (“Plan”).

TRG aims to protect its workforce by enacting all appropriate prevention efforts. TRG is continually monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate.

Employees with questions are encouraged to contact Angela Gilbert, TRG Representative at 734.365.3465 or email at angela@trgschools.com Or, you may contact Kim Romine, Human Resources via phone at 586-731-5300 and/or email at Kim@therominegroup.com.

TRG designates the following worksite supervisors/employees to implement, monitor, and report on this Plan: Superintendent and Principal. TRG will designate additional individuals as needed.

This Plan is maintained and posted at all school locations in the main office.

1. Prevention Efforts and Workplace Controls

a. Cleanliness and Social Distancing

Requires the closure of the school building. The only exceptions are:

- Those district employees or contractors that are necessary to conduct minimum basic school operations consistent with the Preparedness Plan. This includes those facilitating modes of instruction, distributing materials and equipment, or performing other necessary in-person functions.
- Food service workers preparing food for distribution to students or their families.
- Licensed child – care providers and they families served.

Suspend athletics, extracurricular activities, inter-school activities and busing.

Instruction will be fully virtual and plans and implementation can be found in our Plan.

Food service will continue distribution for those eligible students.

Pay will continue for school employees while redeploying staff to provide meaningful work in the context of our Preparedness Plan.

Only critical infrastructure workers performing necessary work, or workers permitted by Executive Order to resume duties, are directed to report on-site. For such workers, TRG abides by the recommended social distancing and other safety measures and establishes the following:

- Gatherings where social distancing cannot be maintained are prohibited;
- Staff meetings are postponed, cancelled or held remotely;

- Employees are encouraged to maintain physical distance even when on break, as well as before and after working hours;
- Employees are required to maintain physical distance when reporting to work, clocking in, leaving work, and clocking out;
- TRG utilizes ground markings, signs, and physical barriers, as appropriate, to further facilitate social distancing;
- Employees' work stations are no fewer than six feet apart;
- Whenever possible, TRG utilizes flexible and/or rotational scheduling, including staggered start and break times, to limit the number of employees simultaneously working on-site;
- TRG assigns employees to dedicated entry points to reduce congestion at the main entrance;
- TRG provides visual indicators of appropriate spacing for employees throughout the premises and outside of the dedicated entry points in case of congestion;
- TRG restricts usage of non-essential common space;
- TRG utilizes physical barriers, where possible and appropriate, separating work stations from cafeteria tables;
- TRG turns off water fountains;
- TRG posts this Plan to emphasize the importance of personal hygiene;
- Employees' interactions with the general public and delivery personnel are modified to allow for social distancing and additional physical space between parties; and
- Non-essential travel and in-person visits are postponed or cancelled.

TRG provides employees with, at a minimum, non-medical grade face coverings, as well as appropriate personal protective equipment ("PPE") (e.g., gloves, goggles, face shields, face masks). Face coverings must be worn by employees at all times. The exception to wearing face coverings for employees is during meals and unless face coverings cannot be medically tolerated. PPE is available at Main Office and, when used, must be disposed of at Main Office.

In addition, TRG is instituting the following cleanliness measures:

- Where possible, increasing ventilation rates and circulation throughout worksites;
- Implementing a cleanliness plan and infection-control measures in accordance with EPA Guidance for Cleaning and Disinfecting, performing routine environmental cleaning and disinfection with an EPA-approved disinfectant, especially of common areas and frequently touched surfaces;
 - Identifying what needs to be cleaned with soap and water, including visibly dirty surfaces;
 - Identifying what needs to be disinfected with an EPA-approved disinfectant or EPA-approved alternative, considering estimates that COVID-19 lasts in the air for 3 hours and on common surfaces for varying lengths of time (e.g., 5 days on glass; 4 days on wood; 3 days on plastic and stainless steel; and 24 hours on cardboard);
- Where available, providing hand-washing and/or hand-sanitizing stations in high-traffic areas to enable easy access by employees.
- Provide hand sanitization stations in each classroom.

- Provide each classroom with disinfecting supplies.
- Teachers will schedule regular cleaning of their classrooms.

TRG identifies the following locations as high-risk areas: hallways, elevators, break rooms, and office spaces. Employees must maintain social distancing when occupying and/or passing through these areas. There may only be 3 people in the break area at one time. No communal appliances are permitted for use. There may only be one person riding the elevator at a time. Six feet of social distance must be maintained in the hallways.

TRG provides employees with cleaning and disinfecting supplies. It is each staff member's responsibility to inform the main office when cleaning supplies are low to ensure restocking timely.

Employees are expected to minimize COVID-19 exposure by:

- Cleaning work stations at the beginning and end of each shift;
- Avoiding, when possible, the use of other employees' phones, desks, offices, or other work tools and equipment;
- Frequently cleaning and disinfecting tools and equipment;
- Frequently washing hands with soap and water for at least 20 seconds;
- Discontinuing the use of hand dryers;
- Utilizing hand sanitizer when soap and water are unavailable;
- Avoiding touching their faces with unwashed hands;
- Avoiding handshakes or other physical contact;
- Avoiding close contact with sick people;
- Practicing respiratory etiquette, including covering coughs and sneezes;
- Immediately reporting unsafe or unsanitary conditions on TRG premises to designated Plan supervisors and/or Human Resources;
- Complying with TRG's daily screening processes;
- Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms;
- Complying with self-isolation or quarantine orders; and
- Utilizing personal protective equipment and hand sanitizer on public transportation.

Employees are trained on the information contained within this Plan, as well as the CDC's "How to Protect Yourself and Others" and "How to Safely Wear and Take Off a Cloth Face Covering" posters, attached here. Employees return a signed acknowledgement to Human Resources, confirming their receipt and review of the information.

b. Supplemental Measures Upon Notification of Employee's COVID-19 Diagnosis and/or Symptoms

An employee with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must be immediately removed from the worksite.

In response to a confirmed diagnosis or display of COVID-19 symptoms, as defined by the Daily Screening process, by any individual who worked at or visited the worksite, TRG:

- Informs all employees, owners, contractors, or suppliers who may have come into contact with the diagnosed/symptomatic individual in the 48 hours preceding the onset of symptoms of a potential exposure;
- Keeps confidential the identity of the diagnosed/symptomatic individual; and
- Implements its response plan and cleaning and disinfecting protocols, including shutting down appropriate areas of the premises, increasing ventilation, and conducting a deep cleaning of both the diagnosed/symptomatic individual's workstation and those common areas potentially infected by the individual.

All employees who worked in sustained, close proximity to the diagnosed/symptomatic individual (i.e., those employees who worked within six feet of the diagnosed/symptomatic individual for at least ten minutes) in the 48-hour timeframe are also removed from the worksite for at least 14 days; however, should these exposed employees later develop COVID-19 symptoms and/or receive a confirmed diagnosis, they may not report on-site until all return-to-work requirements are met, defined below.

TRG's Human Resources Department confidentially maintains a central log of diagnosed/symptomatic employees. If applicable, TRG notifies TRG leadership, contractors or owners of confirmed COVID-19 diagnoses among workers on premises.

Within 24 hours of a confirmed COVID-19 diagnosis, TRG notifies the local public health department.

TRG's Human Resources maintains documentation related to exposure notifications.

TRG completes an OSHA Form 300, as well as a Form 301, "if it is more likely than not that a factor or exposure in the workplace caused or contributed to the illness." If an employee infects a coworker, the coworker has suffered a work-related illness if one of the recording criteria (e.g., medical treatment or days away from work) is met.

c. Worker Exposure Classification

Employees' "worker exposure" is classified as lower risk by the Occupational Safety and Health Administration's guidance because they do not frequently and/or closely interact with the general public, and social distancing can be maintained between coworkers.

Given this classification, no additional controls are recommended or required by OSHA at this time.

2. Identification and Isolation of Sick and/or Exposed Employees

Risk and exposure determinations are made without regard to employees' protected characteristics, as defined by local, state, and federal law.

Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employees' personnel documentation.

a. Employees' Self-Monitoring

The following employees should **not** report to work and, upon timely notification to their supervisor and Human Resources, will be removed from the regular work schedule:

- Employees who are currently and atypically suffering from symptoms of COVID-19, such as fever of 100.4 degrees or greater, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, sore throat, new loss of smell or taste, congestion or runny nose, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis;
- Employees who, in the last 14 days, have had close contact with and/or live with any person having a confirmed COVID-19 diagnosis; and
- Employees who, in the last 14 days, have had close contact with and/or live with any person who is atypically suffering from symptoms of COVID-19, such as fever of 100.4 degrees or greater, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, sore throat, new loss of smell or taste, congestion or runny nose, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting.

Such employees may only resume in-person work upon meeting all return-to-work requirements, defined below.

b. Daily Screenings

To prevent the spread of COVID-19 and reduce the potential risk of exposure, TRG screens employees and visitors on a daily basis at dedicated entry points; TRG ensures that employees and visitors utilize these entry points by barring entry via other egresses.

Employees are asked the following questions before entering the worksite:

1. Are you currently and atypically suffering from any of the following symptoms – fever of 100.4 degrees or greater, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, sore throat, new loss of smell or taste, congestion or runny nose, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting?
 - a. Once a touchless thermometer is available, temperature checks are performed.
 - b. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until employee is permitted to return to work as defined below.
2. Have you lived with, or had close contact with, someone in the last 14 days diagnosed with or displaying the symptoms of COVID-19?
 - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the close contact.

3. Have you travelled internationally in the last 14 days?
 - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the return from travel.

Visitors who reply “Yes” to any of the above questions are not permitted entrance.

Employees who develop symptoms during their shift must immediately report to their supervisor and/or Human Resources.

TRG’s Human Resources maintains documentation related to daily screenings.

c. Return-to-Work Requirements

Employees who were themselves diagnosed with COVID-19, or experienced symptoms thereof, as defined by the Daily Screening process, may only return to work upon confirmation of the cessation of symptoms and contagiousness, proof of which may be acquired via the test-based strategy or the symptom-based strategy.

The test-based strategy is preferred but relies upon the availability of testing supplies and laboratory capacity. Under this strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- Resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- Two consecutive negative results from COVID-19 tests conducted at least 24 hours apart and in accordance with the current FDA/CDC-recommended procedure.

Under the symptom-based strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- At least 10 days have passed since symptoms first appeared.

Employees who came into close contact with, or live with, an individual with a confirmed diagnosis or symptoms may return to work after either 14 days have passed since the last close contact with the diagnosed/symptomatic individual, or the diagnosed/symptomatic individual receives a negative COVID-19 test.

Employees are typically required to submit a release to return to work from a healthcare provider; given the current stressors on the healthcare system, TRG may accept written statements from employees confirming all the factors supporting their release.

3. Workplace Flexibilities and Potential Benefits for Employees Affected by COVID-19

TRG employees may be eligible for paid and unpaid leaves of absence.

Employees may be permitted to utilize available paid-time off provided under TRG policy concurrently with or to supplement any approved leave.

a. FFCRA

Employees may qualify for two different types of paid leave under the Families First Coronavirus Response Act (“FFCRA”).

Under the Emergency Paid Sick Leave Act (“EPSLA”), employees may seek up to two weeks (i.e., 10 business days) of paid leave for the following reasons:

1. Subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
2. Advised to self-quarantine due to concerns related to COVID-19;
3. Experiencing symptoms of COVID-19 and seeking a medical diagnosis;
4. Caring for an individual subject to a quarantine or isolation order or advised to self-quarantine due to concerns related to COVID-19;
5. Caring for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions; and
6. Experiencing any other substantially similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretary of the Treasury and the Secretary of Labor. (Please note, the Secretary of Health and Human Services has not defined conditions which trigger this subpart under the EPSLA.)

Under the Emergency Family and Medical Leave Expansion Act, employees may seek up to twelve weeks of leave to care for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions. The first two weeks of leave, which run concurrently with the EPSLA leave, may be unpaid; the remaining ten weeks of leave are paid at a rate equivalent to two-thirds of an employee’s regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

b. Executive Order 2020-36

Employees who require leave beyond the EPSLA because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis/symptoms, may be eligible for unpaid leave under Executive Order 2020-36 until permitted thereunder to return to work.

c. Unemployment Compensation Benefits

Under Executive Order 2020-76, and the federal CARES Act, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration.

Employees who are unable to report to work for reasons related to COVID-19 are referred to Human Resources for information on unemployment compensation benefits. Such reasons include the following:

1. Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;
2. Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath);
3. Having close contact in the last 14 days with a confirmed COVID-19 diagnosis;
4. Needing to care for someone with a confirmed COVID-19 diagnosis; and
5. Fulfilling a family care responsibility as a result of a government directive (e.g., caring for a child whose school or childcare provider is closed or otherwise unavailable due to COVID-19).

d. FMLA and ADA

Employees may be entitled to unpaid leave under the Family and Medical Leave Act (“FMLA”) if their absence is related to their own serious health condition or that of a family member. COVID-19 may constitute a serious health condition where “complications arise.”

TRG is also mindful of its obligations under the Americans with Disabilities Act (“ADA”). Specifically, if an employee requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then TRG engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable) or work an alternative schedule.

4. Plan Updates and Expiration

This Plan responds to the COVID-19 outbreak. As this pandemic progresses, TRG will update this Plan and its corresponding processes.

This Plan will expire upon conclusion of its need, as determined by TRG and in accordance with guidance from local, state, and federal health officials.

ACKNOWLEDGMENT

By signing below, Employee acknowledges receipt of:

Employee understands it is his/her responsibility to review and understand the above. Employee acknowledges and agrees that he/she will comply with all safety and COVID-19 procedures implemented by TRG.

Employee

Date